

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

JOSE REYES, as Personal Representative
for the Estate of BOBBY REYES;
and SARAH JONES,

Plaintiffs,

Case No. _____

vs.

Hon. _____

MONROE COUNTY, a Municipal
Corporation; and SONYA SAMPSEL,
in her individual capacity;

Defendants.

James B. Rasor (P43476)
Andrew J. Laurila (P78880)
Rasor Law Firm, PLLC
Attorneys for *Plaintiff*
201 E 4th Street
Royal Oak, MI 48067
(248) 543-9000/(248) 543-9050 (fax)
jbr@rasorlawfirm.com
ajl@rasorlawfirm.com

FIRST AMENDED COMPLAINT AND JURY DEMAND

NOW COMES Plaintiff, JOSE REYES, as Personal Representative for the ESTATE OF BOBBY REYES, deceased, and SARAH JONES, by and through their attorneys, RASOR LAW FIRM, PLLC, and for their Complaint and Jury Demand against the above-named Defendants, jointly and severally, states as follows:

PARTIES & JURISDICTION

1. This cause of action is brought pursuant to 42 U.S.C. § 1983, as well as the Fourteenth Amendments to the United States Constitution, and pendant claims arising under the laws of the State of Michigan.

2. This Court has jurisdiction over the claims arising under federal law pursuant to 28 U.S.C. § 1331 and supplemental jurisdiction over the claims arising under state law pursuant to 28 U.S.C. § 1367.

3. Venue is appropriate in this Court pursuant to 28 U.S.C. § 1391(b), as this cause of action arose within the Eastern District of Michigan.

4. Plaintiff, Jose Reyes, is and was at all times relevant hereto, a citizen of the United States and a resident of the City of South Rockwood, County of Monroe, State of Michigan.

5. Plaintiff is the father and duly appointed Personal Representative of Bobby Reyes, deceased, and brings this suit in his representative capacity as the Personal Representative of the estate.

6. Plaintiff Sarah Jones is a resident of the City of South Rockwood, County of Monroe, State of Michigan, is deceased Bobby Reyes' mother, and asserts claims in her individual capacity arising out of the death of her son.

7. Bobby Reyes was at all times relevant hereto a citizen of the United States.

8. Defendant Monroe County was at all times relevant hereto, a body politic and Municipal corporation organized under the laws of the State of Michigan and is responsible for the operation of the Monroe County Central Dispatch (herein “MCCD”).

9. At all times material and relevant hereto, Defendant Sonya Sampsel was a dispatcher of the MCCD and was acting under the color of state law and in the course and scope of her employment. She is sued in her individual capacity.

FACTUAL ALLEGATIONS

10. On or about September 21, 2019 at approximately 9:52 p.m., Plaintiff’s decedent, Bobby Reyes (herein “Bobby”), who was fourteen years old at the time, suffered a severe asthma attack while at home, located at 12010 Telegraph Road, South Rockwood, MI 48179.

11. While Bobby had been diagnosed with asthma earlier that summer, it had been controlled with an albuterol inhaler, so the severity of his asthma attacked was unexpected as Bobby was an otherwise healthy child with no prior history of serious illness.

12. When he began experiencing the onset of the asthma attack, Bobby attempted to locate his nebulizer to perform a breathing treatment but was unable to find it and advised his mother, Sarah Jones, that he was struggling to breath and asked her to call 911.

13. Because Bobby was having significant difficulty breathing and expressed a need for emergency medical attention, at approximately 9:55 p.m., Plaintiff Jones loaded Bobby into her vehicle to drive him to the Ash Township Fire Station #2 located at 1677 Ready Road, Carleton, Michigan, and simultaneously called 911 while in the car heading to the Fire Station.

14. Ash Township Fire Station #2 is approximately 1.2 miles away from Plaintiff's decedent's home, a distance that can be covered in roughly 2 minutes by motor vehicle.

15. Sarah's 911 call was received by a Monroe County Central Dispatch's 911 operator, Defendant Sonya Sampsel, at approximately 9:55 p.m.

16. During the 911 call, Sarah informed Defendant Sampsel that her son was having a severe asthma attack, was struggling to breath, and that she was taking him to the Ash Township Fire Department.

17. At all material times during this telephone call, Defendant Sampsel was on notice that Bobby was not breathing, meaning time was of the essence for him to receive emergency CPR.

18. Upon information and belief, Defendant Sampsel incorrectly logged the location as "Ash Township Firemen[']s Association" in Defendant's software, which is located at 12875 Horan Street, Carleton, MI, near the Ash Carleton Park.

19. Upon arriving at Ash Township Fire Station #2, Sarah, still on the 911 call with the Defendant Sampsel, exited the vehicle and started pounding on the fire station door pleading for help, but no one answered.

20. Shortly after arriving at the Fire Station and while his mother was pounding on the fire station door, Bobby exited the vehicle and collapsed onto the ground.

21. Upon information and belief, at the time Bobby fell to the ground he experienced severe breathing difficulties and lost alertness.

22. Because no EMS personnel had arrived, Defendant Sampsel provided CPR instructions to Sarah, who attempted to follow those instructions to administer CPR.

23. Despite Bobby being at Ash Twp. Fire Station #2 on Ready Road, at approximately 9:57 p.m., Defendant's 911 operator dispatched EMS units, including police and fire, to a CPR in progress at Ash Township Firemen's Association, located at 12875 Horan St., Carleton, Michigan 12875.

24. Upon information and belief, other units were sent to Ash Carleton Park located at 12899 Horan St., Carleton, Michigan 48117, which is adjacent to the Fireman's Association building, both of which were approximately 3.3 miles away from Bobby's actual location at Firehouse #2.

25. Ash Township Firefighters and Carleton Police Department officers arrived at Ash Carleton Park at approximately 10:01 p.m. but were unable to locate Bobby because he was not there.

26. Despite the EMS being dispatched to the wrong address, Defendant Sampsel repeatedly told Sarah that “help was on the way” and “they should be there at any moment.”

27. Given Defendant Sampsel’s reassurances that help would be there, Sarah did not further attempt to obtain emergency assistance; i.e. she relied on Defendant Sampsel’s assurances and remained in her present location.

28. At approximately 10:03 p.m., Defendant Sampsel changed the address, evidently realizing her gross mistake, sending units to the proper location at Ash Township Fire Station #2, where Bobby had been since approximately 9:55 p.m.

29. EMS personnel did not arrive at Fire Station #2 until approximately 10:05 p.m., where they found Sarah still attempting to perform basic CPR on an unresponsive Bobby and radioed all other units responding to come to the correct location at Fire Station #2.

30. As such, Sarah and Bobby remained at Fire Station #2 waiting for EMS for approximately ten minutes solely based on the reassurances of Defendant Sampsel that “help was on the way.”

31. Upon information and belief, firefighters that finally arrived at the scene expressed grave concern about being sent to the wrong location, particularly as time is of the essence when an individual suffers a severe cardiac episode eliminating oxygen to the brain.

32. According to Defendant's dispatch logs, EMS and firefighters began CPR on Bobby at approximately 10:06 p.m.

33. Sometime after the first responders finally arrived at the proper location, additional EMS personnel arrived with an AED and bivalve breathing mask and took over for the fire department personnel who had been doing chest compressions on Bobby.

34. The AED and bivalve breathing mask were critical to the first responders ability to undertake lifesaving resuscitation attempts

35. Once paramedics were able to revive Bobby's pulse, he was taken to Beaumont Hospital in Trenton, Michigan at approximately 10:35 p.m.

36. Trenton Beaumont is approximately 9.7 miles away from Ash Township Fire Station #2 or roughly 15 minutes by motor vehicle.

37. Upon information and belief, Bobby arrived at Trenton Beaumont at approximately 10:50 p.m. and was admitted at 10:51 p.m.

38. Bobby was diagnosed with cardiac arrest and a brain injury caused by low oxygen levels; he was in a coma requiring a ventilator, feeding tube and assistance with all activities of daily living from the time of his arrival to the ER.

39. Bobby's coma was the result of the above-referenced EMS delay and his mother's detrimental reliance on Defendant Sampsel's assurances that help would be there.

40. On or about September 23, 2019, Bobby was subsequently airlifted to C.S. Mott Children's Hospital in Ann Arbor, Michigan.

41. Bobby's condition remained unchanged until C.S. Mott Children's Hospital withdrew life-sustaining medical treatment on [date], causing his death.

COUNT I
FOURTEENTH AMENDMENT VIOLATIONS UNDER
42 U.S.C. § 1983 AS TO DEFENDANT SAMPSEL

42. Plaintiff reasserts and re-alleges each and every allegation contained in paragraphs 1 through 41, as if fully set forth herein.

43. This action is brought pursuant to 42 U.S.C. § 1983 against Defendant Sampsel in her individual capacity for depriving Plaintiff of his constitutionally protected due process interest, under color of law, in violation of the Due Process Clause of the Fourteenth Amendment to the United States Constitution.

44. Plaintiff's decedent had a clearly established right, under the Fourteenth Amendment to the United States Constitution, to not have his "life, liberty, or

property” deprived without due process, which includes to be free from danger created by Defendant.

45. The acts of Defendant, specifically but not limited to sending the EMS to the wrong address and/or providing assurances to Bobby’s mother that “help was on the way”—effectively a death sentence for Bobby given it precluded his mother to seek further emergency assistance—constituted deliberate indifference to Plaintiff’s right, in violation of the Fourteenth Amendment.

46. These claims are cognizable under 42 U.S.C. § 1983.

47. As a result of Defendant’s conduct complained of herein, Plaintiff suffered a deprivation of clearly established and well-settled rights protected and secured by the Fourteenth Amendment to the United States Constitution.

48. Defendant Sampsel was deliberately indifferent to Plaintiff’s decedent, which was a proximate cause of his death and conscious suffering.

49. Defendant is not entitled to governmental or qualified immunity because her actions constitute an affirmative act that substantially increased the risk of danger to Bobby Reyes by placing him in grave danger of serious, immediate and proximate harm, which caused his death.

50. Defendant’s affirmative actions are outrageous and shock the conscience.

51. Had EMS been dispatched to the correct location and/or had Bobby's mother known of the delay, Bobby would have received prompt emergency CPR and respiratory aid, which would have eliminated the loss of oxygen to his brain.

52. Pursuant to 42 U.S.C. § 1983, Defendant Sampsel is liable to Plaintiff for all damages allowed under federal law. To the extent that the damages allowable and/or recoverable are deemed insufficient to fully compensate Plaintiff and/or to punish or deter the Defendant, this Court must order additional damages to be allowed so as to satisfy any and all such inadequacies. Defendant's conduct was and remains extreme and outrageous subjecting Defendant to punitive damages.

53. As a result of the Defendant's actions and/or omissions, Plaintiff has the following damages:

- a. Special damages in the form of medical, funeral, and burial expenses;
- b. Compensatory damages;
- c. Conscious pain and suffering;
- d. Loss of companionship;
- e. Punitive damages;
- f. All damages allowable under Michigan law, including but not limited to the Michigan Wrongful Death Act, M.C.L. § 600.2922;
- g. All damages allowable under Federal law, including but not limited to 42 U.S.C. § 1983; and
- h. Reasonable costs and attorney's fees under 42 U.S.C. § 1988.

WHEREFORE, Plaintiff Jose Reyes, as Personal Representative of the Estate of Bobby Reyes, prays for a judgment against Defendants, jointly and severally, including punitive damages and attorney's fees and costs pursuant to 42 U.S.C. § 1988, and all allowable interest thereon.

COUNT II
MUNICIPAL LIABILITY AS TO DEFENDANT MONROE COUNTY

54. Plaintiff reasserts and re-alleges each and every allegation contained in paragraphs 1 through 53, as if fully set forth herein.

55. Defendant Monroe County's liability as a municipality arises out of *Monell v. Department of Social Services*, 436 U.S. 658 (1978).

56. Defendant Monroe County through their policy making officials:

- a. Failed to establish, implement, and/or execute adequate policies, procedures, rules and regulations to ensure individuals, such as Bobby Reyes, received prompt and adequate emergency services;
- b. Failed to establish, implement, and/or execute adequate policies, procedures, rules and regulations ensuring that EMS operators such as Defendant Sampsel were trained to obtain and input proper information into Defendant's software so EMS is dispatched to the correct address;
- c. Failed to properly train its employees, including the above-named Defendant;
- d. Failed to have policies and procedures that would promptly recognize and correct wrong information input into the EMS software;
- e. Failed to establish, implement, and/or execute adequate policies, procedures, rules and regulations that ensured EMS operators such as Defendant Sampsel took down correct information so to dispatch EMS to the proper locations;

- f. Defendant's policy, procedures, regulations, and customs, and/or its failure to enact the same, caused and was the driving force behind the violations of Plaintiff's constitutional rights as alleged in this Complaint;

57. At all times material hereto, Defendant Monroe County, through its agents, was deliberately indifferent to the strong likelihood that constitutional violations, such as those in the instant case, would occur, and pursued policies, practices, and customs that were a direct and proximate cause of the deprivations of Plaintiff's decedent's constitutional rights.

58. At all times material hereto, Defendant Monroe County knew that its policies and procedures regarding EMS operators' conduct during 9-1-1 telephone calls were inadequate and that the inadequacy of these policies and/or training would lead to attenuated EMS response time and this type of danger.

59. Upon information and belief, Defendant maintained a policy of EMS operators, such as Defendant Sampsel, telling distressed callers that EMS "was on the way".

60. Defendant's policy of telling callers that EMS "was on the way" was a direct and proximate cause of the deprivations of Plaintiff's decedent's constitutional rights.

61. Through recording 9-1-1 calls and other forms of training/retraining techniques, Defendant Monroe County knew or should have known that Defendant

Sampsel lacked proper training and experience was at risk for this type of event to occur.

62. These claims are cognizable under 42 U.S.C. § 1983.

63. The customs, policies and/or practices of Defendant Monroe County were a proximate cause of the death and conscious suffering of Plaintiff's decedent for the aforementioned reasons.

64. As a result of the Defendants' actions and/or omissions, Plaintiff has the following damages:

- a. Special damages in the form of medical, funeral, and burial expenses;
- b. Compensatory damages;
- c. Conscious pain and suffering;
- d. Loss of companionship;
- e. Punitive damages;
- f. All damages allowable under Michigan law, including but not limited to the Michigan Wrongful Death Act, M.C.L. § 600.2922;
- g. All damages allowable under Federal law, including but not limited to 42 U.S.C. § 1983; and
- h. Reasonable costs and attorney's fees under 42 U.S.C. § 1988.

WHEREFORE, Plaintiff Jose Reyes, as Personal Representative of the Estate of Bobby Reyes, prays for a judgment against Defendants, jointly and severally, including punitive damages and attorney's fees and costs pursuant to 42 U.S.C. § 1988, and all allowable interest thereon.

**COUNT III – GROSS NEGLIGENCE, WILLFUL AND
WANTON MISCONDUCT
AS TO THE INDIVIDUAL DEFENDANT**

65. Plaintiff incorporates by reference each and every allegation contained in paragraph 1-64 as if fully set forth herein.

66. The above-named individual Defendant independently owed Plaintiff a duty to exercise reasonable care.

67. Defendant Sampsel had a specific role within Defendant's EMS Dispatch Department, specifically but not limited to when she took Plaintiff's 9-1-1 call, dispatched EMS to the wrong location, and reassured Plaintiff that EMS was on the way to the location, and she undertook a duty in performing those functions.

68. Based on the above, Defendant owed Plaintiff a duty to exercise reasonable care during her conduct involving Plaintiff's request for EMS.

69. Plaintiff relied on the individual Defendant to perform that duty to ensure the proper, adequate, and prompt emergency response to her 9-1-1 call.

70. Plaintiff relied on the individual Defendant to perform this duty and provide correct, up-to-date information about the EMS' arrival.

71. Defendant failed to exercise reasonable care in the operation of these duties.

72. Defendant breached her duties to Plaintiff in the following ways including but not limited to:

- a. Failing to dispatch EMS to the proper location despite being told the specific location;
- b. Failing to obtain the correct information so to dispatch EMS to proper location;
- c. Failing to enter the correct information into Defendant's emergency software so EMS would be dispatched to the correct location;
- d. Failing to promptly correct her mistake upon actual or constructive notice that she had dispatched EMS to the incorrect location;
- e. Informing Plaintiff that EMS was on the way, causing Plaintiff's mother's reliance on the same, when in fact EMS was not on the way but sent to the wrong location;
- f. Failing to inform Plaintiff that EMS had been sent to the wrong location;
- g. Causing a delay in the EMS response to Plaintiff's 9-1-1 call;
- h. Failing to properly input and dispatch EMS to the correct address knowing Plaintiff was suffering a severe respiratory event and time was of the essence;
- i. Any and all breaches that might be discovered during the course of litigation.

73. Plaintiff suffered harm resulting from Defendant's failures to exercise reasonable care and to exercise reasonable care in the above-referenced conduct involving the dispatching and response to Plaintiff's emergency request.

74. Defendant's failures to exercise reasonable care caused the Plaintiff's injuries and were entirely foreseeable.

75. Defendant is liable to Plaintiff for all harms resulting to himself from Defendant's failures to exercise reasonable care.

76. Defendant's acts and/or omissions were the proximate cause of the Plaintiff's damages.

77. Defendant Sampsel's conduct and/or failures to act constitutes gross negligence because it was so reckless that it demonstrates a substantial lack of concern for an imminent injury that would result.

78. The performance of governmental functions constituting gross negligence falls within the exception to governmental immunity pursuant to MCL § 691.1407 and/or MCL § 333.20965.

79. As a result of the Defendant's actions and/or omissions, Plaintiff has the following damages:

- a. Special damages in the form of medical, funeral, and burial expenses;
- b. Compensatory damages;
- c. Conscious pain and suffering;
- d. Loss of companionship;
- e. All damages allowable under Michigan law, including but not limited to the Michigan Wrongful Death Act, M.C.L. § 600.2922;
- f. Reasonable costs and attorney's fees

g. Any other damages that become known throughout the course of discovery

WHEREFORE, Plaintiff Jose Reyes, as Personal Representative of the Estate of Bobby Reyes, respectfully requests that this Court enter a judgment against Defendants in an amount that Plaintiffs are found to be entitled to together with interest, costs, and reasonable attorney fees, and such other relief as this Court deems fair and just under the circumstances.

COUNT IV
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS
ON BEHALF OF PLAINTIFF SARAH JONES
AS TO DEFENDANT SAMPSEL

80. Plaintiff incorporates by reference each and every allegation contained in paragraph 1-79 as if fully set forth herein.

81. Defendant Sampsel's conduct during the 9-1-1 call with Plaintiff Sarah Jones, as described above, was extreme and outrageous and went beyond all possible bounds of decency.

82. As Defendant recklessly and tortiously handled Plaintiff Sarah Jones' 9-1-1 call regarding her seriously distressed son, Plaintiff was in physical contact with her son, even going as far as providing CPR to her son while being told by Defendant Sampsel that "help was on the way."

83. Plaintiff Jones was physically present with her son while they waited for ten minutes for EMS to arrive, and immediately observed her son's rapidly deteriorating physical anguish arising from Defendant's conduct.

84. The above conduct described herein caused Plaintiff to suffer severe emotional distress.

85. As a result of the conduct described above, Plaintiff Sarah Jones suffered and continues to suffer physical injuries directly related to her emotional trauma, including but not limited to loss of sleep, nervousness, chest pain and rapid heartbeat, muscle tension, and significant other physical symptoms of the distress these events caused her.

86. Plaintiff Jones was present at the date and time of these events and she contemporaneously observed her son's rapidly deteriorating medical condition while waiting for EMS to arrive, which caused her significant emotional trauma.

87. As a direct and proximate result of the negligence and/or gross negligence and/or willful, wanton, reckless and/or negligent misconduct of Defendant, Plaintiff has suffered and continues to suffer damages, both physically and emotionally.

88. Defendant Sampsel's conduct and/or failures to act giving rise to Plaintiff's severe emotional distress constitutes gross negligence because it was so reckless that it demonstrates a substantial lack of concern for an imminent injury that

would result given she was on telephone with Plaintiff and specifically knew of the distress that Plaintiff Sarah Jones suffered as these events unfolded.

89. Defendant Sampsel's above-referenced conduct constitutes gross negligence and falls within the exception to governmental immunity pursuant to MCL § 691.1407 and/or MCL § 333.20965.

90. As a direct and proximate result of the Defendant's gross negligence and/or willful, wanton, reckless and/or negligent misconduct, Plaintiff has suffered and continues to suffer damages, both physical and emotional.

WHEREFORE, Plaintiff Sarah Jones, respectfully requests that this Court enter a judgment against Defendant in an amount that Plaintiff is found to be entitled to together with interest, costs, and reasonable attorney fees, and such other relief as this Court deems fair and just under the circumstances.

COUNT V
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
ON BEHALF OF PLAINTIFF SARAH JONES
AS TO DEFENDANT SAMPSEL

91. Plaintiff incorporates by reference each and every allegation contained in paragraph 1-90 as if fully set forth herein.

92. Defendant's conduct, as set forth above, was extreme and outrageous and went beyond all possible bounds of decency.

93. Defendant intentionally and/or recklessly failed to take the proper information from Plaintiff Jones and intentionally and/or recklessly dispatched EMS to an improper location and one in which she knew or should have known was not the correct address.

94. Defendant Sampsel repeatedly telling Plaintiff Jones that EMS was “on the way” despite her actual and/or constructive knowledge EMS was dispatched to the wrong location was extreme and outrageous.

95. Defendant Sampsel’s statements and conduct during the 911 call at issue and while on the phone with Plaintiff was extreme and outrageous.

96. Defendant’s intentional and/or reckless conduct was in the face of her training and the County’s policies, which would have allowed EMS to promptly respond and arrive and provide lifesaving support to her son.

97. Despite being told the proper location where Plaintiff and her son were at, Defendant intentionally and/or recklessly undertook acts knowing the risk delayed EMS service would have and the effects this would have on Plaintiff Jones, who was already showing severe distress on the telephone.

98. In engaging in the offensive and outrageous conduct set forth herein, Defendant intended and/or recklessly caused emotional injury to Plaintiff by effectuating the death of her son and/or recklessly disregarded the probability that her intentional/reckless conduct would result in the severe emotional harm to family

members like Plaintiff Jones who was present and effectively unable to help her loved one.

99. As a result of Defendant's intentional and/or reckless decisions, Plaintiff suffered severe emotional trauma as she helplessly watched her son suffer severe cardiac distress.

100. As a result of Defendant's intentional and/or reckless conduct, Plaintiff Sarah Jones suffered irreparable emotional harm.

101. Defendant acted with reckless disregard for the extreme conditions it placed Bobby Reyes in given the likelihood that such reckless conduct would cause emotional trauma to Plaintiff Sarah Jones, particularly given her proximity to the events.

102. Defendant's above-referenced conduct was extremely reckless and went beyond all possible bounds of decency.

103. The above-referenced conduct described herein did in fact cause Plaintiff to suffer severe emotional distress, and damages to her thought processes and emotions.

104. Defendant Sampsel's above-referenced conduct constitutes an intentional tort and falls within the exception to governmental immunity pursuant to MCL § 691.1407.

105. As a direct and proximate result of the acts and conduct of Defendant complained herein, Plaintiff Sarah Jones has suffered, continues to suffer, and will continue to suffer into the future, the emotional and psychological harm, indignity, anxiety, mental anguish, emotional distress, humiliation, embarrassment, outrage, shame, fear, and all other damages or consequences related to these incidents.

WHEREFORE, Plaintiff Sarah Jones, respectfully requests that this Court enter a judgment against Defendant in an amount that Plaintiff is found to be entitled to together with interest, costs, and reasonable attorney fees, and such other relief as this Court deems fair and just under the circumstances.

RESPECTFULLY SUBMITTED:

RASOR LAW FIRM, PLLC

/s/ Andrew J. Laurila

James B. Rasor (P43476)

Andrew J. Laurila (P78880)

Attorneys for Plaintiffs

201 E. Fourth Street

Royal Oak, Michigan 48067-3846

(248) 544-9300/(248) 543-9050 Fax

jbr@rasorlawfirm.com

ajl@rasorlawfirm.com

Dated: July 17, 2020

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

JOSE REYES, as Personal Representative
for the Estate of BOBBY REYES;
and SARAH JONES,

Plaintiffs,

Case No. _____

vs.

Hon. _____

MONROE COUNTY, a Municipal
Corporation; and SONYA SAMPSEL,
in her individual capacity;

Defendants.

James B. Rasor (P43476)
Andrew J. Laurila (P78880)
Rasor Law Firm, PLLC
Attorneys for *Plaintiff*
201 E 4th Street
Royal Oak, MI 48067
(248) 543-9000/(248) 543-9050 (fax)
jbr@rasorlawfirm.com
ajl@rasorlawfirm.com

DEMAND FOR JURY TRIAL

NOW COMES Plaintiff, JOSE REYES, as Personal Representative for the ESTATE OF BOBBY REYES, deceased, and SARAH JONES, by and through their attorneys, RASOR LAW FIRM, PLLC, and hereby demands a trial by jury in the above-captioned cause of action.

RESPECTFULLY SUBMITTED:

RASOR LAW FIRM, PLLC

/s/ Andrew J. Laurila

James B. Rasor (P43476)

Andrew J. Laurila (P78880)

Attorneys for Plaintiffs

201 E. Fourth Street

Royal Oak, Michigan 48067-3846

(248) 544-9300/(248) 543-9050 Fax

jbr@rasorlawfirm.com

ajl@rasorlawfirm.com

Dated: July 17, 2020